



FEDERAL ELECTION COMMISSION
WASHINGTON, D. C. 20463

RQ-2

Jane G. Mattoon, Treasurer
Keep Our Majority Political Action
Committee (KOMPAC)
P.O. Box 864
Washington, DC 20044

OCT 18 2000

Identification Number: C00307405

Reference: August Monthly Report (7/01/00-7/31/00)

Dear Ms. Mattoon:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): "Convention. Reception Expenses". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please amend Schedule A supporting Line 11(c) by providing the address for each contribution received from a political committee. 11 CFR §104.3(a)(4)(ii) and (iii)(B)

-Schedule A of your report discloses contributions from political committees that fail to include a full and/or recognizable name. Reporting only the name of the connected organization, abbreviating the name of the committee so it is unrecognizable, or using an indistinguishable acronym is inadequate. The following committee names from your report need further clarification: "Pharmaceutical Research &", "Am. Assoc. Of Nurse Anesthetists", "Nat'l Assn. Of Convenience Stores", "Americans for Free International Trade" and "Credit Suisse First Boston Government".

Please amend your report to include the missing information. 11 CFR §§100.12, 102.14(c) and 104.3(a)(4)(ii)

KEEP OUR MAJORITY POLITICAL ACTION COMMITTEE (KOMPAC)
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-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$7,356.50 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$0 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(c)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Please provide a Schedule H3 to support the entry reported on Line 18 of the Detailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3, not Schedule A, regardless of the amount transferred. 2 U.S.C. §434(b)(3)(D)

-Line 21(a)(i) of the Detailed Summary Page of your report discloses a total of \$14,713 in shared federal activity. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$7,356.50. Please amend your report to clarify the discrepancy.

-Line 21(a)(ii) of the Detailed Summary Page of your report discloses a total of \$0 in shared non-federal activity. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$7,356.50. Please amend your report to clarify the discrepancy.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each

disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Your committee reports disbursements on Schedule B and Schedule H4 which appear to be identical. Please note that any activity which is financed entirely by the federal account should be reported on Schedule B supporting Line 21(b), not Schedule H4 supporting Line 21(a)(i). Likewise, any allocable expenses which are paid jointly should only be disclosed on Schedule H4 supporting Line 21(a)(i), not Schedule B supporting Line 21(b). Duplication in reporting disbursements may cause inflated disbursement totals. Please amend your report to clarify your disbursements. 11 CFR §106.5

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Thomas F. Maxwell, III

Thomas F. Maxwell, III
Reports Analyst
Reports Analysis Division

